



US District Court 401 Courthouse Square, Alexandria, VA 22314

Vient, Plaintiff vs. Gannett Co., Inc., Defendant Case: 1:18: CV1562

Motion to Amend Complaint

Pro-se Plaintiff Benjamin Vient Motions here to the Court to Amend the Complaint to reflect Defendant's factual uses of Plaintiff's works. Rule 15 (a)(2) states: "A party may amend its pleading only with the opposing party's written consent or the court's leave. The court should freely give leave when justice so requires."

Discovery Documentation evidences Defendant has infringed upon all of Plaintiff's works listed in the Complaint. (TX0008587743, TX0008587772, TX0008589705.) In evidence being submitted contemporaneously here with the Motion to Correct Defendant's Discovery Record, it appears Florida Today has distributed 62 of Plaintiff's works with a ProQuest/US Newsstream, with a date listing of 2017-11-23. Plaintiff has no such agreement for his works.

Pro-se Plaintiff is using the mail to submit this Motion, and is uncertain if Defendant will respond with additional Discovery information in the meantime, but makes this Motion to Amend Complaint with these additional facts.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Benjamin'.

Benjamin Vient, Plaintiff Pro-Se

CERTIFICATE OF MAILING I HEREBY CERTIFY that on 2020, per previous agreement between parties to use designated email addresses, I sent a true and correct copy of the foregoing to Laurin Mills at laurin@samek-law.com.

A handwritten signature in blue ink, appearing to read 'Benjamin'.

Benjamin Vient